

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
HAMMOND DIVISION**

JAMAR THOMPSON,	)	
	)	
Plaintiff,	)	
	)	Case No.: 2:21-cv-00065-_____
vs.	)	
	)	
LOVE’S TRAVEL STOP #417;	)	
LOVE’S TRAVEL STOPS &	)	
COUNTY STORES, INC.,	)	
Individually, and d/b/a LOVE’S	)	
TRAVEL STOP #417; LOVE’S	)	
SOLUTIONS, LLC, Individually,	)	
and d/b/a LOVE’S TRAVEL STOP	)	
#417; and LOVE’S TRAVEL	)	
SOLUTIONS, LLC, Individually,	)	
And d/b/a LOVE’S TRAVEL STOP	)	
#417,	)	
	)	
Defendants.	)	

**NOTICE OF REMOVAL OF CIVIL ACTION**

Defendants, Love’s Travel Stops and Country Stores, Inc., incorrectly named herein as Love’s Travel Stop #417, Love’s Travel Stops & Country Stores, Inc., Individually, and d/b/a Love’s Travel Stops #417; Love’s Solutions, LLC, Individually, and d/b/a Love’s Travel Stop #417; and Love’s Truck Solutions, LLC, Individually and d/b/a Love’s Travel Stop #417 (“Love’s), by counsel, pursuant to 28 U.S.C. §§ 1441 and 1446, hereby gives notice of the removal of this cause to the United States District Court for the Northern District of Indiana, Hammond Division, from the Circuit Court of Lake County where this action, styled as *Jamar Thompson v. Love’s Travel Stops and Country Stores, Inc., incorrectly named herein as Love’s Travel Stop #417, Love’s Travel Stops & Country Stores, Inc., Individually, and d/b/a Love’s Travel Stops #417; Love’s Solutions, LLC, Individually, and d/b/a Love’s Travel Stop #417; and Love’s Truck*

*Solutions, LLC, Individually and d/b/a Love's Travel Stop #417*, Cause No. 45C01-2101-CT-000063 (the "State Court Litigation"), is now pending, and states:

1. The State Court Litigation was commenced on January 14, 2021, in the Circuit Court of Lake County, an Indiana state court located within this judicial district and division of this Court. *See* 28 U.S.C. § 1446(b). Process was served on Love's on or about January 21, 2021, and this Verified Notice of Removal of Civil Action is being filed within the time required by 28 U.S.C. § 1446(b). A true and accurate copy of the Summons, Complaint, and Appearance served upon Love's is attached as Exhibit A, as well as two (2) Notice of Service of Summons with signed certified mail, return receipt green card, Appearance of Attorneys on behalf of Defendants, Unopposed Motion for Enlargement of Time, and proposed Order Enlarging Time to Plead. No other process, orders, or pleadings have been served on the Defendants.

2. The State Court Litigation is a civil action for personal injury resulting from an alleged fall on the Love's premises.

3. The United States District Court for the Northern District of Indiana, Hammond Division, has diversity jurisdiction over this case pursuant to 28 U.S.C. § 1332, by reason of the diversity of citizenship of the parties and the amount in controversy exceeds Seventy-five Thousand Dollars (\$75,000.00), exclusive of costs and interest. A true and accurate copy of an email with Plaintiff's counsel confirming the amount in controversy is attached as Exhibit B.

4. At the time the action was commenced in state court and at the present time, Plaintiff, Jamar Thompson, was a resident of the City of Gary, State of Indiana, making him a citizen of Indiana for purposes of 28 U.S.C. §1332.

5. At the time the action was commenced in state court and at the present time, Love's was and is a business entity incorporated in the State of Oklahoma with its principal place of

business in the State of Oklahoma, making Love's a citizen of Oklahoma for purposes of 28 U.S.C. §1332.

6. There is complete diversity of citizenship for purposes of 28 U.S.C. §1441(b).

7. Written notice of the filing of this Verified Notice of Removal of Civil Action is concurrently being provided to the parties as required by law.

8. A true and accurate copy of this Notice of Removal of Civil Action will be filed with the Lake County Circuit Court as required by 28 U.S.C. § 1446(d).

WHEREFORE, Defendant, Love's Travel Stops and Country Stores, Inc., incorrectly named herein as Love's Travel Stop #417, Love's Travel Stops & Country Stores, Inc., Individually, and d/b/a Love's Travel Stops #417; Love's Solutions, LLC, Individually, and d/b/a Love's Travel Stop #417; and Love's Truck Solutions, LLC, Individually and d/b/a Love's Travel Stop #417, by counsel, requests that this cause proceed in this Court as an action properly removed.

Respectfully submitted,

/s/ Christina M. Bruno  
Steven D. Groth (Atty. No. 6196483)  
Christina M. Bruno (Atty. No. 27334-49)

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 22, 2021, a copy of the foregoing document was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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I hereby certify that on February 22, 2021, a copy of the foregoing document was mailed by first class mail, postage prepaid and properly addressed to the following parties:

*None.*

/s/ Christina M. Bruno  
Christina M. Bruno